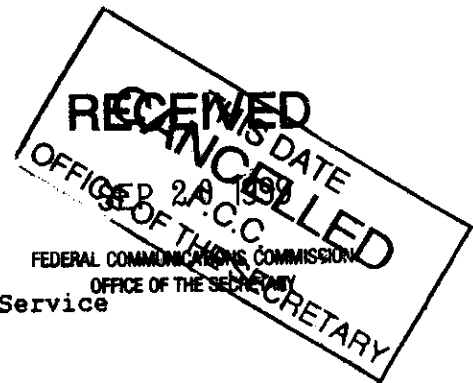


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Before the
Federal Communications Commission
The Portals
455 12th Street S.W.
Washington, D.C. 20554



In the Matter of:

Proposal for Creation of the Low Power FM (LPFM) Broadcast Service

Docket No. MM 99-25

Comments of John Lentz

Dear Commissioner and Commission Staff:

I am very interested in starting up a neighborhood type Low Power FM station in my community. My intentions would be to cover community issues that affect the local citizens and provide other types of information as well as local high school sports and music, both well known artists as well as local music, local groups involving all the people in the community a chance to use the microphone to either view there opinions on subjects as well as anyone to DJ and play there favorite selections to the community. Also to provide an outlet for people to air there views and comments regarding issues in a local, state, federal and global level. I am interested in a commercial service and perhaps interested in broadcasting as a "micro" type station of 1-10 watts in my respected community.

Here within are response and additions to the proposals that should be considered in establishing a Low Power FM Broadcast service. Enclosed are 15 copies, plus an original, of my Written Comments on the Proposed Rule in Docket MM 99-25.

The Low Power FM broadcast stations should be located in the current FM Broadcast band of 88-108 Mhz. The LPFM operator should be able to apply for either commercial or a non-commercial license. Such stations concerning commercial operation should be located within the same set up of 92.1 to 107.9 Mhz. For a non-commercial LPFM station should be located in the 88.1 to 91.9 Mhz band. In the future the lower end (87.5 to 87.9 Mhz.) of the FM broadcast spectrum should be considered for extension after when all analog TV channel 6 stations are re-located to the UHF band as a High Definition TV station, which according to current information that is to be completed before the year 2007.

I don't feel that the LP-1000 tier is necessary, but it may to some and if sufficient room on the spectrum allows an LP-1000 in most areas, thats fine as long as there is also room to set up a Primary status LP-100 and LP-10 stations. I feel all 3 power tiers should be primary and not to be allowed to be bumped by a translator, boosters or a higher broadcast station. It can work out that LP-10 10 watt stations each be set up 10 miles apart on the same frequency, 25 for LP-100 and 40 miles for LP-1000 without causing any major interference. Removal of the 2nd and 3rd adjacent frequencies against a higher power FM station should create hardly no interference with today's high technology FM receivers. In the past 10 to 15 years there have been more and more highly selective and sensitive receivers that can tune in to a distant station with little to no interference at all, such as the General Electric Super Radio series sold at regular audio and retail stores. Car radios are very selective and sensitive as well and also be capable to handle 2nd and 3rd adjacent channel stations without any problems.

An LP-10, 1 to 10 watt FM station should be seriously considered as there are many purposes for such a low power station, especially covering an area that includes minorities as well as the area neighborhood station. Such an example of a 10 watt FM station licensed by the FCC

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(WCCX, 104.5) in the early 70s and still on the air today with those power levels at Carrol College, in Waukesha, WI. which supplies college student DJs during the week, and spanish programming to the small mexican population in Waukesha.

However its interesting to note that on WCCX's 104.5 Mhz frequency, there is another station just 30 miles away also broadcasting on 104.5 Mhz., WSLD with a power level of 6000 watts. I am not aware if there has been any complaints of interference or not, I haven't heard of anyone complaining of any problems here. So even if a low power station uses a Class-A frequency being used by a station 70 miles away, shouldn't be a problem. It is noted on my car radio that when I am about 1 to 1.5 miles away from WCCX's transmitter site, almost out of the city limits of Waukesha, in comes WSLD, 104.5 Mhz signal replacing WCCX.

Certifying microradio transmitters is mainly up to the FCC. I would think that such FCC compliant devices will be required to be used for anything that exceeds power levels of Part-15 for FM to be used for the Low Power Broadcast service. It is believed that a FCC complaint transmitter is inspected and certified to limit spurious and harmonic radiation to prevent interference with other radio signals, especially aircraft and emergency frequencies. Also that certain audio and transmissions specifications are necessary for proper receiving.

All 3 power level tiers should be allowed to use auxillary broadcast frequencies to do remote live broadcasts of live schooling events, on the spot news events as well as doing live on the spot promotions for a local area business.

Power Levels for all 3 tiers should be considered as follows:

Class Tiers	Minimum	Maximum
LP-1000	200 Watts	1000 Watts
LP-100	20 Watts	100 Watts
LP-10	1 Watt	10 Watts

As for the upcoming future of IBOC technology, there shouldn't be any problems, nor will it cause any interference to existing analog stations. Because of its Digital process signal, it will only be received by a digital reciver and generally any interference near the fundamental frequency of the digital transmitter will be easily rejected by the digital reciver. Analog is known not to defeat any other interfering signal, where as digital easily can. But careful selection of frequency, at least 3 channel adjacent from the IBOC signal should be ok.

I commend the Commission for taking action to end the current ban on Low Power Radio. I urge the Commission to carry this process forward until a viable, and meaningful, Low Power Radio Service has been firmly established.

Respectfully Submitted,



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